Tabernacle and the inflicting of further injury upon the work of the said Bethel Tabernacle which has been conducting religious services in Frederick City and County since June, 1930.

THIRTEENTH: That your Orators are unable to file as exhibits with this Bill any of the papers concerning the organization of the Bethel Tabernacle or of any of its meetings for the reason that said papers and minutes are in the possession of the Defendants.

Wherefore your Orators pray your Honors for the following relief:

- A. That the Defendants, Elizabeth A. Beylor, William Elmer Sittig and William Layman and each of them shall and may be enjoined from acting as and representing themselves to be the Trustees of Bethel Tabernacle.
- B. That the Defendant, Evelyn D. Becker shall and may be enjoined from preaching or conducting services in said church building.
- C. That the Defendants and each of them shall and may be enjoined and required to desist from interfering as aforesaid with your Orators, J. Vernon Boone, Silas T. Rickards and Marshall Bell in the performance of their duties as Trustees of said Bethel Tabernacle.
- D. That said Defendants and each of them shall and may be enjoined and required to surrender to your Orators the possessions of the church property and the keys to the church building and to refrain from interfering with the control and custody thereof by your Orators.
- E. That said Defendants and each of them shall and may be enjoined and required to turn over and deliver to your Orators the records of Bethel Tabernacle and any or all funds belonging to said church in the possession of the Defendants or any of them whether consisting of rents, collections, donations or otherwise; that the Defendants, Evelyn D. Becker and Elizabeth A. Beylor and each of them shall and may be enjoined and directed to account to your Orators for the rents received by them arising out of the lease of the parsonage belonging to Bethel Tabernacle and shall be further required to return to your Orators the furniture unlawfully removed from the parsonage of Bethel Tabernacle. That the Defendants and each of them shall and may be enjoined from conveying any of the property of the Bethel Tabernacle to the Religious Denomination known as Seventh Day Adventist or any other person, corporation or association.
- F. That said paper writing purporting to be a deed from the Trustees of Bethel Tabernacle to Evelyn D. Becker and Elizabeth A. Beylor as joint tenants and not as tenants in common be declared to be void and may be vacated and annulled.
- G. That your Orators may have such other and further relief as their case may require.

May it please your Honors to grant unto your Orators the writ of subpoena directed to the Defendants Evelyn D. Becker, Mt. Pleasant, Maryland, Elizabeth A. Beylor, Mt. Pleasant, Maryland, William Elmer Sittig, South Market Street, Frederick, Maryland and William Layman, North Bentz Street, Frederick, Maryland, all adults, commanding them to be and appear in your Honorable Court on some certain day to be named therein and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

Alton Y. Bennett

Robert E. Clapp Jr.

SOLICITORS FOR COMPLAINANTS.

STATE OF MARYLAND,

FREDERICK COUNTY, TO-WIT:

I HEREBY CERTIFY, That on this 25th day of February, A.D., 1938, before me, the subscriber a Notary Public of the State of Maryland in and for Frederick County, personally appeared J. Vernon Boone, Silas T. Rickards and Marshall Bell, Trustees of Bethel